

Exhibit 21

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

KATHY CLARK, AMY ENDSLEY, SUSAN)
GRIMMETT, MARGUERIETTE SCHMOLL,)
AND KEVIN ULRICH, ON BEHALF OF)
THEMSELVES AND ALL OTHERS)
SIMILARLY SITUATED,)
)
Plaintiffs,) Civil Action No. 1:12-CV-00174-SS
)
vs.)
)
CENTENE CORPORATION, CENTENE)
COMPANY OF TEXAS, L.P., AND)
SUPERIOR HEALTHPLAN, INC.,)
)
Defendants.)

DEFENDANT'S SECOND SUPPLEMENTAL OBJECTIONS AND ANSWERS TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO DEFENDANT CENTENE CORPORATION

COMES NOW Defendant Centene Corporation (hereafter "Centene" or "Defendant") by and through its counsel, and pursuant to Rule 33 and 26(e)(1)(A) of the Federal Rules of Civil Procedure, submits its Second Supplemental Answers and Objections to Plaintiff's First Set of Interrogatories as follows:

INTERROGATORIES

INTERROGATORY NO. 1

Describe the job duties and identify what you consider to be the primary duty (i.e., the principal, main, major or most important duty) for these jobs:

- a). Case Manager/Pre-Certification;
- b). Case Manager/Prior Authorization;
- c). Case Manager I;
- d). Utilization Review Nurse; and

education for individuals who perform such jobs, because it does not employ anyone in those positions.

INTERROGATORY NO. 5

Identify by name and address all facilities, subsidiary locations, and Centene Corporation locations where employees are, or were, located who have performed the jobs listed in Interrogatory No. 1 (and/or jobs with substantially similar duties) and who have been classified as exempt and not paid overtime for any hour worked over forty in any work week since February 22, 2009.

ANSWER:

Objection. Centene objects on the grounds that the foregoing interrogatory assumes that Centene employs individuals in the positions listed in Interrogatory No. 1. Subject to and without waiving this objection, Centene states that it has no such positions in its organization and it does not employ any individual who performs the jobs listed in Interrogatory No. 1.

SUPPLEMENTAL ANSWER:

Subject to and without waiving the above objection, Centene states that the subsidiary locations where employees of its subsidiaries who performed the jobs listed in Interrogatory No. 1 are, or were, are as follows:

Subsidiary	Location(s)
Centene Management Company, LLC	One Cascade Plaza National City Center, 13th Floor Akron, Ohio 44308
Centene Management Company, LLC	2810 Meredyth Drive, Suite B Albany, GA 31707
Centene Management Company, LLC	4665 Cornell Road Fountain Pointe, Suite 300 Blue Ash, OH 45241
Centene Management Company, LLC	1380 Soldiers Field Road Suite 300 Brighton, MA 02135
Centene Management Company, LLC	8585 Archives Ave, Suite 302 Baton Rouge, LA 70809
Centene Management Company, LLC	871 Lowcountry Blvd, Ste 100 Mt. Pleasant, SC 29464

Centene Management Company, LLC	Roosevelt Building 16090 Swingley Ridge Road, Suite 500 Chesterfield, MO 63017
Centene Management Company, LLC	US Bank Bldg. 175 Third Street, Ste 1200 Columbus, OH 43215
Centene Management Company, LLC	1441 Main Street Ste. 900, 9th Floor Columbia, SC 29201
Centene Management Company, LLC	3500 East Coliseum Blvd, Suite 110 Ft. Wayne, IN 46805
Centene Management Company, LLC	3 Summit Park Drive, Suite 700 Independence, OH 44131-2599
Centene Management Company, LLC	1099 North Meridian Street, Suite 400 Indianapolis, IN 46204-1041
Centene Management Company, LLC	8301 Cypress Plaza, Suite 124 Jacksonville, FL 32256
Centene Management Company, LLC	111 East Capitol Street, Suite 500 Jackson, MS 39201
Centene Management Company, LLC	201 East Main Street, Suite 501 Lexington, KY 40507
Centene Management Company, LLC	577 Mulberry Street 5th Floor, Suite 580 Macon, GA 31202-0310
Centene Management Company, LLC	10700 West Research Drive, Suite 300 Milwaukee, WI 53226
Centene Management Company, LLC	3200 Highlands Parkway, Suite 300 Smyrna, Georgia 30082
Centene Management Company, LLC	1301 International Parkway, Suite 400 Sunrise, FL 33323
Centene Management Company, LLC	Tacoma Financial Center 1145 Broadway Tacoma, WA 98402

Centene Management Company, LLC	3505 E. Frontage Rd., Suite 300 Tampa, FL 33607
Centene Management Company, LLC	Charter One Bank Building 3130 Executive Parkway 5th Floor Toledo, OH 43606
Centene Management Company, LLC	999 Oakmont Plaza Drive, Suite 510 Westmont, IL 60559
Centene Management Company, LLC	119 S. Main Street Yazoo City, MS 39194
Centene Management Company, LLC	499 Thornall, Ste. 400 Edison, NJ 08818
Centene Management Company, LLC	245 Edison Road, Suite 110 Mishawaka, IN 46545
Centene Company of Texas, LP	The Regency Bldg, Ste. 202 2100 South Interstate-35 Austin, TX 78704
Centene Company of Texas, LP	5350 S. Staple, Suite 225 Corpus Christi, TX 78411
Centene Company of Texas, LP	4099 McEwen Rd, Suite 500 Dallas, TX 75244
Centene Company of Texas, LP	6070 Gateway Blvd. E, Suite 400 El Paso, TX 79905
Centene Company of Texas, LP	1455 West Loop South 3rd Floor, Suite 300 Houston, TX 77027
Centene Company of Texas, LP	7202 Slide Road, Ste 202 Lubbock, TX 79424
Centene Company of Texas, LP	3900 North 10th Street, 6th Floor McAllen, TX 78501
Centene Company of Texas, LP	MedCentre Plaza, Suite 340 8431 Fredericksburg Road San Antonio, TX 78229
Banker's Reserve Life Ins. Co. of	The Regency Bldg, Ste. 202

Wisconsin	2100 South Interstate-35 Austin, TX 78704
Banker's Reserve Life Ins. Co. of Wisconsin	5350 S. Staple, Suite 225 Corpus Christi, TX 78411
Banker's Reserve Life Ins. Co. of Wisconsin	4099 McEwen Rd, Suite 500 Dallas, TX 75244
Banker's Reserve Life Ins. Co. of Wisconsin	1455 West Loop South 3rd Floor, Suite 300 Houston, TX 77027
Banker's Reserve Life Ins. Co. of Wisconsin	MedCentre Plaza, Suite 340 8431 Fredericksburg Road San Antonio, TX 78229
Bridgeway Health Solutions of Arizona, LLC	1501 West Fountainhead Corporate Park, Suite #295 Tempe, AZ 85282
Bridgeway Health Solutions of Arizona, LLC	1415 Melody Lane Bisbee, AZ 85603
Bridgeway Health Solutions of Arizona, LLC	3950 S. Country Club Rd. Suite 4312, Box 430 Tucson, AZ 85714
Nurtur Health, Inc.	20 Batterson Park Road Farmington, CT 06032

SECOND SUPPLEMENTAL ANSWER:

Subject to and without waiving the above objection, Centene states that the subsidiary locations where employees of its subsidiaries who performed the jobs listed in Interrogatory No. 1 are, or were, are as follows:

NovaSys Health, Inc.	One Allied Drive, Suite 1400 Little Rock, AR 72203
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INTERROGATORY NO. 6

Identify by name, last known address, phone number, e-mail address, social security number, job title and dates of employment with Defendant, all persons who have been employed by Defendant since February 22, 2009, who performed the jobs listed in Interrogatory No. 1

ANSWER:

Centene is without information sufficient to form a belief as to whether some other person or legal entity is liable to Plaintiffs in this matter. Centene's investigation is ongoing, and it will supplement its response to this interrogatory as required under Federal and Local Rules of Civil procedure.

Respectfully submitted,

BY: 

Michael J. Golden
State Bar No. 24032234

BOULETTE & GOLDEN LLP
2801 Via Fortuna, Suite 530
Austin, TX 78746
512.732.8902
512.732.8905 (facsimile)
mike@boulettegolden.com

Robert A. Kaiser
Jovita M. Foster
Jeremy M. Brenner
ARMSTRONG TEASDALE LLP
7700 Forsyth Blvd., Suite 1800
St. Louis, Missouri 63105
314.621.5070
314.621.5065 (facsimile)
rkaiser@armstrongteasdale.com
jfoster@armstrongteasdale.com
jbrenner@armstrongteasdale.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record via US mail on this 12th day of October 2012, as follows:

David G. Langenfeld
Dunham & Jones, P.C.
1800 Guadalupe Street
Austin, Texas 78701
512.777.7777 (Telephone)
512.340.4051 (Facsimile)



Michael J. Golden
Counsel for Defendants

STATE OF MISSOURI)
COUNTY OF St. Louis) ss.
)

I hereby certify, swear, and attest that the above Answers to Interrogatories are complete, true and accurate to the best of my knowledge and belief.

By: Tricia Dinkelman
(Not to be signed by counsel)

Tricia Dinkelman
Printed Name

VP, Tax
Title

Subscribed and sworn to before me this 12th day of October, 2012.

Carol R. Toft
Notary Public

My Commission Expires:

